

## **Remarks**

As stated above, Applicants appreciate the Examiner's thorough examination of the subject application and request reexamination and reconsideration of the subject application in view of the preceding amendments and the following remarks.

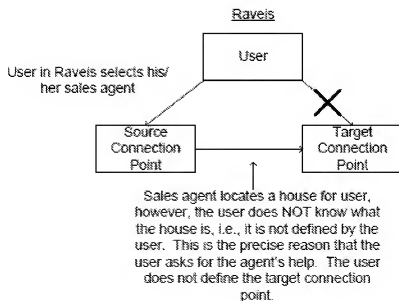
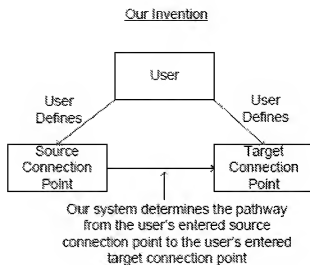
As of the Non-Final Office Action of December 17, 2010 Claims 1-22 were pending in the subject application, of which Claims 1, 11, 21 and 22 are independent claims. With this response Applicants have amended Claims 1-3, 5, 6, 9-14, 16, 17, and 20-22, and cancelled Claims 4 and 15. No new matter is believed to have been added as a result of these amendments.

### **Claim Rejections - 35 U.S.C. § 102**

Claims 1-22 are rejected under 35 U.S.C. 102(b) as anticipated by Raveis, Jr., (U.S. Patent No. 6,321,202, hereinafter "Raveis"). Applicants respectfully traverse these rejections.

Applicants respectfully submit that the subject matter of Raveis is entirely different from the subject matter of the present application. Specifically, it is Applicants' understanding that Raveis is directed not towards determining connections between parties using private links, *see, e.g., Subject Application, Title; Subject Application, ¶¶ [0001]-[0003]*, but rather to a method for communicating data "relating to a plurality of vendors . . . associated with at least one phase of a real estate transaction . . . *upon the occurrence of the particular phase of the real estate transaction.*" *Raveis*, col. 2, ll. 42-51. The Examiner appears to confirm this understanding as each passage from Raveis referenced or quoted in the Office Action dated December 17, 2010 refers to some aspect of a real estate transaction. *See, e.g., Official Action*, pp. 3, 4 ("including sales agent, . . . and real estate company"), p. 5 ("related to the real estate listing"), p. 6 ("sales agents, MLS data, phones are fields for data"), etc.

The following diagram may be helpful to the Examiner in identifying the differences between Applicants' invention and the Raveis reference.



As shown above, Applicants respectfully submit that Raveis fails to disclose "defining the target connection point as the list of target contacts, comprising at least one individual, business, or both, entered by the user in the user interface". It is Applicants' understanding that the user in Raveis does not enter the target connection point, the target connection point is found by the sales agent.

Further, in an effort to further advance prosecution, Applicants have amended Claim 1, which is provided below for the Examiner's convenience.

A computer-implemented method of determining a pathway between a source connection point and a target connection point comprising:

- providing a computer system having at least one database comprising data defining individuals, businesses~~entities~~, or both as connection points;
- providing a user interface configured to allow entry by a user of a list of source contacts, comprising one or more individuals, one or more businesses, or both, and a list of target contacts, comprising at least one individual or business;
- defining the source connection point as [[a]]the list of source contacts comprising individuals, businesses~~entities~~, or both, entered by the user in the user interface;
- defining the target connection point, ~~wherein the target connection point is as the list of target contacts, comprising~~ at least one individual, business~~entity~~, or both, entered by the user in the user interface; and
- defining, in response to the entry by the user, in the user interface, of the list of source contacts and the list of target contacts, a set of intermediate connection points as a series of intermediate contacts that collectively define the pathway from the source connection point to the target connection point, as a function of predetermined relationships among a superset of contacts comprising the intermediate contacts.

Support for Applicants' newly amended Claim 1 may be found throughout the Subject Application. For example, "[a] user . . . inputs a source party and a target party . . . . The parties may be people or entities, such as companies, organizations, etc," *Subject Application*, ¶ [0003],

and “the application has been described in connection with an example using businesses and business people as the parties.” *Subject Application*, ¶ [0069]. Further, “[a] user connects to a website associated with the system and inputs a source party and a target party, for the purpose of finding a number of connections between the parties. The parties may be people or entities, such as companies, organizations, etc.” *Subject Application*, ¶ [0003]. And, “[t]he system . . . may also include the various features and capabilities described below, which enable a client (i.e., a user of host system) to generate a list of persons or entities (including groups of persons or groups of lists) that can function as a starting point for a connections query or request. . . . In other forms, rather than a single endpoint, a list of endpoints could be used (i.e., an endpoint list). . . . In yet another form, a user may enter a single starting point and an endpoint list.” *Subject Application*, ¶ [0047]. Also, the “connection-related technology includes a user interface,” *Subject Application*, ¶ [0133] and “[u]sers access the host operation system 102 via a graphical, browser-based interface.” *Subject Application*, ¶ [0135].

Applicants respectfully submit that this amendment further distinguishes the Subject Application from Raveis. Raveis at no point teaches “providing a user interface configured to allow entry by a user of a list of source contacts, comprising individuals, business, or both, **and** a list of target contacts, comprising at least one individual or business.” (emphasis added). Nor does Raveis teach “defining, in response to the entry by the user, in the user interface, of the list of source contacts and the list of target contacts, a set of intermediate connection points as a series of intermediate contacts that collectively define the pathway from the source connection point to the target connection point, as a function of predetermined relationships among a superset of contacts comprising the intermediate contacts.”

Raveis teaches merely, for example, providing a user interface to enter a single contact:

“[i]n accordance with a preferred embodiment, to initiate a search, a real estate company employee enters data into area 410, such as the last name of **the contact** in the last name field, and selects the binocular icon within area 420. During searching, the name fields of the records in the contact database are compared for a match. Once an entered contact name is matched within the contact database, the servers 12 and 14 display to the user the contact information screen 500 as described below with reference to FIG. 5.” *Raveis*, Fig. 4-5, col. 8 ll. 46-54 (emphasis added). Area 410, in *Raveis*, allows entry of only a **single contact** to prompt a search and therefore cannot be said to anticipate “providing a user interface configured to allow entry by a user of a list of source contacts, comprising individuals, business, or both, **and** a list of target contacts, comprising at least one individual or business.” Nor, for the same reasons, can *Raveis* be said to anticipate “**defining, in response to the entry by the user, in the user interface, of the list of source contacts and the list of target contacts, a set of intermediate connection points** as a series of intermediate contacts that collectively define the pathway from the source connection point to the target connection point, as a function of predetermined relationships among a superset of contacts comprising the intermediate contacts.”

In another location, *Raveis* teaches “[i]n the search area 710, a contact box 712 displays the contact information for which the search is being conducted. For example, an Available Suppliers field in area 710 receives a vendor name from the user. The Referral Coordinator is indicated underneath the Available Suppliers field . . . Additionally, fields related to Service Agent and Placement Type offer pull down menus as is well known to those skilled in the art. Lastly, in service area 710, a “search” button can be selected by the user to initiate selecting or editing a vendor.” *Raveis*, col. 9, ll. 35-46.

But neither does this teaching of Raveis anticipate newly amended Claim 1 of the Subject Application. First, Raveis does not indicate that either the “contact information for which the search is being conducted” or the “Referral Coordinator” is entered by the user in this user interface. Indeed, Raveis’ use of “displays” and “indicates” and depiction of these fields in Fig. 7 suggest precisely the opposite. Second, Raveis fails to specify, in this location or elsewhere, what “Service Agent” let alone “fields related to Service Agent” might mean and therefore fails to teach how the existence of “fields related to Service Agent” could anticipate the material of the Subject Application. Third, it would be nonsensical to argue that entry by the user of a vendor name in the Available Suppliers field and a subsequent search using the “search” button to “initiate selecting or editing a vendor” could amount to “entry by a user of a list of source contacts, comprising individuals, business, or both, **and** a list of target contacts, comprising at least one individual or business” and “defining, in response to the entry by the user, in the user interface, of the list of source contacts **and** the list of target contacts, **a set of intermediate connection points as a series of intermediate contacts that collectively define the pathway from the source connection point to the target connection point**, as a function of predetermined relationships among a superset of contacts comprising the intermediate contacts.” This is because Raveis never defines the “search” that will be undertaken by selecting the “search” button beyond suggesting that it “initiate[s] selecting or editing a vendor.” And, further, because the vendor entered by the user as an “Available Supplier” cannot be both the “series of intermediate contacts that collectively define the pathway from the source connection point to the target connection point,” **and** the “target connection point” or “the source connection point.”

Therefore, Applicants respectfully submit that Raveis fails to disclose each and every limitation of Applicants' newly amended Claim 1. As such, Applicants respectfully submit that currently amended Claim 1 is in condition for allowance. Applicants note that currently amended independent Claims 11, 21, and 22 have been drafted and amended to include similar limitations to those of Claim 1 and respectfully submit that Claims 11, 21, and 22 are therefore in condition for allowance as well. Since dependent Claims 2,3, 5-10, 12-14 and 16-20 depend, either directly or indirectly, from Applicants' independent Claims 1 and 11, Applicants respectfully submit that these claims are in condition for allowance as well. Accordingly, withdrawal of the rejection under 35 U.S.C. § 102 of all non-cancelled claims is respectfully requested and an indication of allowability of Claims 1-3, 5-14, and 16-22 is earnestly solicited.

Having overcome all of the outstanding rejections, Applicants respectfully submit that the subject application is now in condition for allowance. Applicants believe that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper.

In consideration of the amendments and foregoing discussion, the application is now believed to be in condition for allowance. Early allowance of the subject application is respectfully solicited. The Examiner is kindly invited to contact Applicants' attorney at 617-854-1460 to facilitate prosecution.

This response should not require any additional fees beyond the fee for a one-month extension of time. However, in the event that additional fees are due, please charge or credit any refund to our Deposit Account No. 50-2324.

Respectfully Submitted,

Dated: April 18, 2011

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